

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CATHERINE MCKOY, MARKUS FRAZIER, and
LYNN CHADWICK, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

THE TRUMP CORPORATION, DONALD J. TRUMP,
in his personal capacity, DONALD TRUMP, JR., ERIC
TRUMP, and IVANKA TRUMP,

Defendants.

No. 1:18-cv-09936-LGS-SLC

**DECLARATION OF CHRISTOPHER R. LE CONEY IN SUPPORT OF
PLAINTIFFS' MOTION TO EXCLUDE DR. PETERSON'S EXPERT
OPINIONS AND TO PRECLUDE DR. HAIR'S
SUPPLEMENTAL DECLARATION**

I, Christopher R. Le Coney, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a member in good standing of the Bar of the State of New York and am admitted to practice before this Court. I am associated with the firm Kaplan Hecker & Fink LLP, counsel for Plaintiffs Catherine McKoy, Markus Frazier, and Lynn Chadwick ("Plaintiffs") and the putative classes. I respectfully submit this declaration in support of Plaintiffs' Motion to Exclude Dr. Peterson's Expert Opinions and to Preclude Dr. Hair's Supplemental Declaration.

2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the transcript of the March 14, 2023 deposition of Defense Expert Dr. Robert A. Peterson.

3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the transcript of the March 20, 2023 deposition of Defense Expert Dr. Joseph F. Hair.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the March 1, 2012 ACN U.S. Compensation Plan Overview that was produced in this litigation with the Bates numbers ACN000151-ACN000156.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the 2012 ACN U.S. Policies and Procedures that was produced in this litigation with the Bates numbers ACN000574-ACN000586.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 5, 2023
New York, New York

/s/ Christopher R. Le Coney
Christopher R. Le Coney